

Application Type New
Facility Type Stormwater
Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL INDUSTRIAL WASTE (IW)
AND IW STORMWATER**

Application No. PA0276367
APS ID 1022331
Authorization ID 1326541

Applicant and Facility Information

Applicant Name	<u>Mott's LLP</u>	Facility Name	<u>Motts LLP Manufacturing & Distribution Center</u>
Applicant Address	<u>7350 Industrial Boulevard</u> <u>Allentown, PA 18106-9344</u>	Facility Address	<u>7350 and 7356 Industrial Boulevard</u> <u>Allentown, PA 18106-9344</u>
Applicant Contact	<u>Bruce Allen, EHS Manager</u>	Facility Contact	<u>Bruce Allen, EHS Manager</u>
Applicant Phone	<u>(267) 272-3065</u>	Facility Phone	<u>(267) 272-3065</u>
Client ID	<u>269414</u>	Site ID	<u>841386</u>
SIC Code	<u>2086,4225</u> <u>Manufacturing - Bottled and Canned Soft Drinks</u> <u>Trans. & Utilities - General Warehousing and Storage</u>	Municipality	<u>Upper Macungie Township</u>
SIC Description		County	<u>Lehigh</u>
Date Application Received	<u>August 25, 2020</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>September 2, 2020</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>New NPDES permit to discharge industrial stormwater.</u>		

Summary of Review

The applicant is requesting a new NPDES permit to discharge stormwater associated with industrial activity to Iron Run, a HQ-CWF, MF (High Quality-Cold Water Fishes, Migratory Fishes) designated receiving stream in state water plan basin 2-C (Lower Lehigh River). As per the Department's current existing use list, the receiving stream segment does not have an existing use classification that is more protective than its designated use.

The stormwater drainage area is a rented site with an existing distribution warehouse and new cold beverage manufacturing facility. Stormwater from the site drains to the MS4 system that is owned and operated by Upper Macungie Township. Ultimately, the stormwater will drain into Iron Run. Stormwater collection drains and treatment facilities onsite are owned and operated by Lehigh Valley Logistics JV 1 Owner, LLC. The stormwater at the site will be routed through BMPs to mimic pre-development hydrologic characteristics. No process waste streams, cooling waters, blowdowns, condensates, or water treatment backwashes will enter the site stormwater system.

The first acceptance of raw materials for the manufacturing operation is expected on October 15, 2020, with the first sellable product anticipated on January 15, 2021.

An Anti-Degradation Module was submitted with the application. All Non-Discharge Alternatives are technically infeasible and/or environmentally unsound. The site is already developed with hydrologic controls in place. Building new facilities on undisturbed greenfield does not make sense. Pollution Prevention and Process Changes are already in place at the site and the applicant is also proposing additional BMPs aimed at preventing stormwater from contacting materials that have the potential to alter stormwater quality.

Approve	Deny	Signatures	Date
X		/s/ Allison Seyfried / Environmental Engineering Specialist	September 11, 2020
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	9-25-20

Summary of Review

The main area of concern is the bulk liquid ingredient (predominately sugar) unloading area at the manufacturing plant. This unloading area has bermed drainage to a trench drain that collects stormwater and directs it to a lift station with a valve system. During unloading, the valve controls will allow diversion to the wastewater system. Stormwater from this area will flow to the stormwater collection system when no unloading is occurring. The applicant also plans to construct a three-walled and roofed structure over this unloading area post-2022.

To further prevent stormwater contact with materials the applicant proposed the following practices: all recycling at the facility will be processed and stored indoors ("dry" recycling), indoor storage of wastewater/process chemicals, and unloading via the Nalco "Portafeed" system.

A separate NPDES permit for stormwater associated with construction activities under 25 PA Code Chapter 102 was submitted on June 9, 2017 for the construction of the manufacturing facility.

The facility is categorized by SIC code 2086 (Manufacturing – Bottled and Canned Soft Drinks) and 4225 (Transportation & Utilities – General Warehousing and Storage). The facility falls under Appendix I and L monitoring requirements of the PAG-03 General Permit. All industries classified under Appendix I and L should be within the following values: 100 mg/L for Total Suspended Solids (TSS), 120 mg/L for Chemical Oxygen Demand (COD), and 30 mg/L for Oil and Grease. These values are included as IMAX (or instantaneous minimum) limitations and should be sampled semi-annually. Semi-annual monitoring and reporting of pH and Nitrate-Nitrate as N are also required under this permit.

The manufacturing building includes industrial wastewater collection and pretreatment to equalize/neutralize the pH of the wastewater discharge. Water treatment includes a reverse osmosis system and carbon filtration soft water system. The pre-treated industrial wastewater discharges to the sanitary sewer.

The permittee states in the application that stormwater conveyance facilities are inspected bi-annually/ after each significant rainfall and that debris and blockages are cleared. The site has five drainage basins, multiple subsurface infiltration beds, and vegetative swales.

PPC Plan implementation and completion of an annual inspection and compliance evaluation are required under the permit.

There are no open violations for this client that would warrant withholding the issuance of this permit.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

